

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ADAMA JAMMEH and OUMIE SALLAH,

Plaintiffs,

v.

HNN ASSOCIATES, LLC, GATEWAY, LLC,
COLUMBIA DEBT RECOVERY, LLC, d/b/a
GENESIS CREDIT MANAGEMENT, LLC, and
WILLIAM WOJDAK,

Defendants.

NO. 2:19-cv-00620-JLR

**STIPULATED MOTION AND ORDER TO
EXTEND BRIEFING SCHEDULE**

**NOTED FOR CONSIDERATION:
SEPTEMBER 25, 2020
Without Oral Argument**

I. STIPULATION

1. The parties have a mediation in this matter scheduled and confirmed for October 19, 2020.

2. In an effort to avoid expending resources on briefing that may become moot if the parties are able to successfully resolve the matter, the parties ask that the Court extend the current deadlines for the remaining briefing on Plaintiffs' supplemental brief in support of class certification, including Defendant's Response to Plaintiffs' Supplemental Brief in Support of Class Certification and Plaintiffs' Reply in Support of Class Certification (Dkt. No. 106) and the supplemental briefing related to Defendant Wodjak's motion for summary judgment (Dkt. No. 53).

3. If the parties are able to reach a negotiated resolution of the case, they will promptly document the agreement and seek the Court's preliminary approval of the agreement and proposed notice under Rule 23(e).

4. If the parties are unable to reach an agreement at mediation, the additional time requested will allow Plaintiffs to complete their planned depositions in preparation for the supplemental briefing on Mr. Wojdak's pending motion for summary judgement and will provide time for CDR to prepare its response to Plaintiffs' supplemental submission on whether an FDCPA subclass should be certified.

5. Trial in this matter is set for October 12, 2021, and discovery cutoff is June 14, 2021 (Dkt. No. 101). Extending the current briefing deadlines will not require an amendment of the trial date or other case deadlines.

6. Accordingly, the parties request that the Court amend the current briefing schedules as follows:

Supplemental briefs on whether a subclass should be certified	CURRENT DEADLINES (Dkt. No. 105)	PROPOSED DEADLINES
CDR's response brief	October 7, 2020	November 2, 2020
Plaintiffs' reply brief	October 14, 2020	November 9, 2020
Submission of Plaintiffs' proposed notice place	20 days after Court's ruling on subclass issue	unchanged

Supplemental briefs on Mr. Wodjak's motion for summary judgment	CURRENT DEADLINES (Dkt. No. 103)	PROPOSED DEADLINES
Complete depositions on individual liability	October 26, 2020	November 20, 2020
Plaintiffs' response brief	November 20, 2020	December 11, 2020
Mr. Wojdak's reply brief	December 11, 2020	January 8, 2021

RESPECTFULLY SUBMITTED AND DATED this 28th day of September, 2020.

TERRELL MARSHALL LAW GROUP

COZEN O'CONNER

By: /s/ Blythe H. Chandler, WSBA #43387

By: /s/ F. Brenden Collier, Admitted Pro Hac Vice

Beth E. Terrell, WSBA #26759
Email: bterrell@terrellmarshall.com
Blythe H. Chandler, WSBA #43387
Email: bchandler@terrellmarshall.com
Ari Y. Brown, WSBA #29570
Email: abrown@terrellmarshall.com
Brittany J. Glass, WSBA #52095
Email: bglass@terrellmarshall.com
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
Telephone: (206) 816-6603
Facsimile: (206) 319-5450

F. Brenden Collier, Admitted Pro Hac Vice
Email: bcoller@cozen.com
COZEN O'CONNER
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Telephone: (215) 665-2000

Sam Leonard, WSBA #46498
Email: sam@seattledbtdefense.com
LEONARD LAW
3614 California Avenue SW, #151
Seattle, Washington 98116
Telephone: (206) 486-1176
Facsimile: (206) 458-6028

Karl Neumann, WSBA #48078
Email: kneumann@cozen.com
Patty Cameron
Email: pcameron@cozen.com
Kellyn A. Green
Email: kagreen@cozen.com
Jan Young
Email: jmyoung@cozen.com
999 Third Avenue, Suite 1900
Seattle, Washington 98104
Telephone: (206) 340-1000

*Attorneys for Defendants HNN Associates, LLC,
Gateway, LLC*

Paul Arons, WSBA #47599
Email: lopa@rockisland.com
LAW OFFICE OF PAUL ARONS
685 Spring Street, #104
Friday Harbor, Washington 98250
Telephone: (360) 378-6496
Facsimile: (360) 378-6498

By: /s/ Elizabeth K. Morrison, WSBA #43042
Elizabeth K. Morrison, WSBA #43042
Email: emorrison@gordonrees.com
Sarah N. Turner, WSBA #37748
Email: sturner@grsm.com
GORDON REES SCULLY MANSUKHANI LLP
701 Fifth Avenue, Suite 2100
Seattle, Washington 98104
Telephone: (206) 695-5100

Attorneys for Plaintiffs

*Attorneys for Columbia Debt Recovery, LLC and
William Wojdak*

II. ORDER

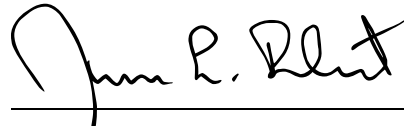
Based on the foregoing Stipulation, it is hereby ORDERED that the current briefing deadlines for the supplemental briefs on class certification and Defendant Wodjak's motion for summary judgment are amended as follows:

Supplemental briefs on whether a subclass should be certified	DUE DATE
CDR's response brief	November 2, 2020
Plaintiffs' reply brief	November 9, 2020
Submission of Plaintiffs' proposed notice place	20 days after Court's ruling on subclass issue

Supplemental briefs on Wodjak's motion for summary judgment	DUE DATE
Complete depositions on individual liability	November 20, 2020
Plaintiffs' response brief	December 11, 2020
Mr. Wojdak's reply brief	January 8, 2021

IT IS SO ORDERED.

DATED this 28th day of September, 2020.



JAMES L. ROBART
United States District Judge

CERTIFICATE OF SERVICE

I, Blythe H. Chandler, hereby certify that on September 28, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Karl Neumann, WSBA #48078

Email: kneumann@cozen.com

Patty Cameron

Email: pcameron@cozen.com

Kellyn A. Green

Email: kagreen@cozen.com

Jan Young

Email: jmyoung@cozen.com

COZEN O'CONNER

999 Third Avenue, Suite 1900

Seattle, Washington 98104

Telephone: (206) 340-1000

F. Brenden Collier, *Admitted Pro Hac Vice*

Email: bcollier@cozen.com

COZEN O'CONNER

1650 Market Street, Suite 2800

Philadelphia, Pennsylvania 19103

Telephone: (215) 665-2000

Attorneys for Defendants HNN Associates, LLC, Gateway, LLC

Elizabeth K. Morrison, WSBA #43042

Email: emorrison@gordonrees.com

Sarah N. Turner, WSBA #37748

Email: sturner@grsm.com

GORDON REES SCULLY MANSUKHANI LLP

701 Fifth Avenue, Suite 2100

Seattle, Washington 98104

Telephone: (206) 695-5100

Attorneys for Columbia Debt Recovery, LLC and William Wojdak

1 DATED this 28th day of September, 2020.

2 TERRELL MARSHALL LAW GROUP PLLC

3 By: /s/ Blythe H. Chandler, WSBA #43387

4 Blythe H. Chandler, WSBA #43387

5 Email: bchandler@terrellmarshall.com

6 936 North 34th Street, Suite 300

7 Seattle, Washington 98103

8 Telephone: (206) 816-6603

9 Facsimile: (206) 319-5450

10 *Attorneys for Plaintiffs*